1 LAW OFFICES OF DALE K. GALIPO Dale K. Galipo (SBN 144074) dalekgalipo@yahoo.com 2 Cooper Alison-Mayne (SBN 343169) 3 cmayne@galipolaw.com 21800 Burbank Boulevard, Suite 310 4 Woodland Hills, CA 91367 Phone: (818) 347-3333 5 Attorneys for Plaintiff Dorothey Heimbach 6 7 8 UNITED STATES DISTRICT COURT 9 EASTERN DISTRICT OF CALIFORNIA 10 2:23-cv-01887-DJC-CSK 11 DOROTHEY HEIMBACH, 12 Plaintiff, Assigned to: District Judge Daniel J. Calabretta 13 VS. JOINT STATEMENT OF THE 14 STANISLAUS COUNTY, JUSTIN CASE CAMARA, and ZA XIONG, 15 FPTC Date: December 18, 2025 Defendants. 1:30 PM Time: 16 Location: Courtroom 7 17 18 19 20 21 22 23 24 25 26 27 28

PLEASE TAKE NOTICE that the Parties hereby submit their Joint 1 2 Statement of the Case. 3 Respectfully submitted, 4 5 Dated: December 11, 2025 LAW OFFICES OF DALE K. GALIPO 6 By: /s/ Cooper Alison-Mayne 7 Dale K. Galipo 8 Cooper Alison-Mayne Attorneys for Plaintiff Dorothey Heimbach 9 10 Dated: December 11, 2025 **PORTER SCOTT** 11 By: /s/ John Whitefleet 12 John Whitefleet Attorney for Defendants 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28

JOINT STATEMENT OF THE CASE

This case arises from the October 8, 2022, encounter between Anthony Silva by Stanislaus County Sheriff's Deputies, during which Plaintiff alleges that Mr. Silva sustained a cervical spine fracture that rendered him quadriplegic. He died approximately eleven months later, on September 10, 2023.

The Plaintiff is Anthony Silva's mother, Dorothey Heimbach. She claims that Stanislaus Sheriff Department Deputies Justin Camara and Za Xiong used excessive and unreasonable force against Anthony Silva and were negligent, causing his paralysis, related injuries, and subsequent death.

Defendants are Stanislaus County, Justin Camara, and Za Xiong. They deny Plaintiff's claims and contend that the use of force was reasonable and not excessive under the circumstances and their conduct was not negligent, nor caused his paralysis, related injuries or subsequent death.